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8 IN THE UNITED STATES DISTRICT COURT

9 EASTERN DISTRICT OF CALIFORNIA

10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 APPROXIMATELY \$28,000.00 IN
U.S. CURRENCY,

15 Defendant.

2:21-MC-00109-TLN-JDP

16

17 STIPULATION AND ORDER EXTENDING TIME
FOR FILING A COMPLAINT FOR FORFEITURE
AND/OR TO OBTAIN AN INDICTMENT
ALLEGING FORFEITURE

18 It is hereby stipulated by and between the United States of America and potential claimant Meuy
Saephan (“claimant”), by and through their respective counsel, as follows:

19 1. On or about January 20, 2021, claimant filed a claim in the administrative forfeiture
20 proceeding with the United States Postal Inspection Service (“USPIS”) with respect to the Approximately
21 \$28,000.00 in U.S. Currency (hereafter “defendant currency”), which was seized on October 26, 2020.

22 2. The USPIS has sent the written notice of intent to forfeit required by 18 U.S.C. §
23 983(a)(1)(A) to all known interested parties. The time has expired for any person to file a claim to the
24 defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than claimant has filed a claim
25 to the defendant currency as required by law in the administrative forfeiture proceeding.

26 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for
27 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency
28 is subject to forfeiture within ninety days after a claim has been filed in the administrative forfeiture

1 proceeding, unless the court extends the deadline for good cause shown or by agreement of the parties.
2 That deadline was April 20, 2021.

3 4. By Stipulation and Order filed April 21, 2021, the parties stipulated to extend to July 19,
4 2021, the time in which the United States is required to file a civil complaint for forfeiture against the
5 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
6 forfeiture.

7 5. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to October
8 18, 2021, the time in which the United States is required to file a civil complaint for forfeiture against the
9 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
10 forfeiture.

11 6. Accordingly, the parties agree that the deadline by which the United States shall be required
12 to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that
13 the defendant currency is subject to forfeiture shall be extended to October 18, 2021.

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15 Dated: 07/16/2021

PHILLIP A. TALBERT
Acting United States Attorney

16 By: /s/ Kevin C. Khasigian
17 KEVIN C. KHASIGIAN
18 Assistant United States Attorney

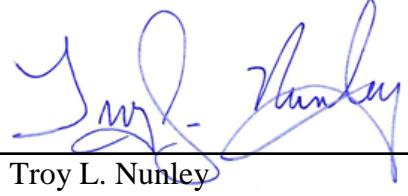
19
20 Dated: 07/16/2021

/s/ Steve Whitworth
STEVEN A. WHITWORTH
Attorney for potential claimant
Meuy Saephan

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22 (Signature authorized by email)

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25 **IT IS SO ORDERED.**

26 Dated: July 16, 2021

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28 
Troy L. Nunley
United States District Judge